UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR WIRE FRAUD

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO.

v. * SECTION:

QUIANA SELDERS * VIOLATION: 18 U.S.C. § 1343

a/k/a/ Quiana Bridges

a/k/a/ Quiana Bridges-Selders *

* * *

The United States Attorney charges that:

COUNT 1

A. <u>AT ALL TIMES MATERIAL HEREIN:</u>

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross ("Red Cross") established assistance centers throughout the region in the late summer and early fall

of 2005.

- 2. At these assistance centers, people affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also required to attest and affirm that they had not received any additional financial assistance from the Red Cross at any other location.
- 3. Once approved, the Red Cross made these disaster assistance funds available in one of several ways, including: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued "Discover" card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued credit/debit/ATM card, issued on-site and activated via phone by the applicant; (4) A personal check authorized by the Red Cross, issued by "Paychex, Inc.," and mailed through the United States Postal Service to an address provided by the applicant.
- 4. The Red Cross purchased 200,000 "gift cards" from Discover, a credit card company. These cards were "loaded" with a specific amount of money, depending upon the applicant's qualifications. The cards were activated by the applicant's calling an activation hotline and were thereafter usable in a manner otherwise consistent with a credit/debit card. The authorization and tracking of purchases and withdrawals for the Discover cards were routed to data centers located in Columbus, Ohio and Dallas, Texas.
- 5. The defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, presented herself to Red Cross assistance centers on six (6) occasions between on or about September 15, 2005 and on or about October 25, 2005. During these visits, she applied for financial

assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her false and fraudulent actions on these 6 applications, the defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, received or attempted to receive direct financial assistance from the Red Cross in one of the four manners described above, totaling \$8,855, of which \$7,590.00 was fraudulently obtained.

B. THE SCHEME TO DEFRAUD

- 6. Beginning on or about September 15, 2005 and continuing through on or about October 25, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Red Cross, by means of false representations, pretenses, and promises, by falsely and fraudulently obtaining financial assistance from the Red Cross, beyond that to which she was entitled.
- 7. It was part of the scheme and artifice to defraud that on or about October 4, 2005, in the Eastern District of Louisiana, the defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, stated that she had not received any other Hurricane Katrina or Rita financial assistance from the Red Cross at any other assistance center when, in truth and fact, as she well knew, he had received such assistance on prior occasions.

C. THE USE OF THE WIRES

8. On or about October 8, 2005, in the Eastern District of Louisiana, the defendant,

QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, for the purpose of executing and attempting to execute the scheme and artifice to defraud as described in Parts A and B, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, used a Red Cross-issued Discover credit card numbered XXXX-XXXX-XXXX-3786 to obtain property, goods, services, and money in the Eastern District of Louisiana, specifically at BJ's Warehouse, located in Hammond, Louisiana, which caused signals, signs, writings, and sounds, to be transmitted from the point of purchase, in the Eastern District of Louisiana, to the Discover card transaction authorization server, located outside the state of Louisiana, approving the transactions, allowing the defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, to receive the property, goods, services, and money by the use of the falsely and fraudulently obtained Discover credit card issued

to the defendant, QUIANA SELDERS, a/k/a Quiana Bridges, a/k/a Quiana Bridges-Selders, on or about October 4, 2005; all in violation of Title 18, United States Code, Section 1343.

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New Orleans, Louisiana February 19, 2010